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July 7, 2023

BY ECF

Hon. Mary Kay Vyskocil
United States District Judge
United States District Court
500 Pearl St.
New York, NY 10007

USDC SDNY
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Re: Ramirez Coyotecalt v. 23RD & 9Th Restaurant Corp. et al
23-cv-03614-MKV

Your Honor:

This firm represents Plaintiff in the above-referenced matter. We write to respectfully request an extension to file the case management plan. The parties apologize for failing to submit the case management plan on June 26, 2023. This is the first request of its kind.

Plaintiff's firm recently experienced a change in staffing and as such, Plaintiff respectfully requests that the deadline to submit be extended to July 13, 2023. We are trying to coordinate with Defendant's counsel regarding the Case Management plan but have not yet received a response. In addition, Plaintiff plans to submit a motion to amend the complaint to add new parties, therefore could not in good faith participate in settlement discussions with Defendants.


The Plaintiff thanks the Court for its time and attention to this matter.

Respectfully Submitted,

/s/Mary Bianco
Mary Bianco, Esq.
CSM Legal, P.C.
Attorneys for Plaintiff

Granted. SO ORDERED. The parties are on notice that failing to comply with court orders may result in sanctions, including monetary sanctions, preclusion of claims, defenses, and evidence, and dismissal of this case with prejudice.

Date: July 10, 2023
New York, New York


Mary Kay Vyskocil
United States District Judge